

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	No:
	)	
V.	)	VIOLATIONS:
	)	
RYAN FLYNN,	)	21 U.S.C. § 846 -
<i>a/k/a Big Boy</i>	)	Conspiracy to Distribute Cocaine
	)	
Defendant	)	21 U.S.C. § 841(a)(1) –
	)	Possession with Intent
	)	to Distribute Marijuana
	)	
	)	21 U.S.C. § 853 –
	)	Forfeiture Allegation

**INDICTMENT**

**COUNT ONE: (21 U.S.C. § 846 – Conspiracy to Distribute Cocaine)**

The Grand Jury charges that:

From in or about October 2016 through in or about May 2017, at Worcester and  
Leicester, in the District of Massachusetts, and elsewhere,

**RYAN FLYNN, *a/k/a Big Boy*,**

defendant herein, did knowingly and intentionally combine, conspire, confederate, and agree  
with Vito Nuzzolilo, and with other persons both known and unknown to the Grand Jury, to  
distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States  
Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO: (21 U.S.C. § 841(a)(1) – Possession of Marijuana with the Intent to Distribute)**

The Grand Jury further charges that:

On or about May 24, 2017, at Worcester, in the District of Massachusetts, and elsewhere,

**RYAN FLYNN, a/k/a Big Boy,**

defendant herein, did knowingly and intentionally possess marijuana, a Schedule I controlled substance, with the intent to distribute.

All in violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE: (21 U.S.C. § 841(a)(1) – Possession of Marijuana with the Intent to Distribute)**

The Grand Jury further charges that:

On or about May 24, 2017, at Leicester in the District of Massachusetts, and elsewhere,

**RYAN FLYNN, a/k/a Big Boy,**

defendant herein, did knowingly and intentionally possess marijuana, a Schedule I controlled substance, with the intent to distribute.

All in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE ALLEGATION - (21 U.S.C. § 853)**

The Grand Jury further charges that:

1. Upon conviction of one or more of the offenses in violation of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in Counts One through Three of this Indictment,

**RYAN FLYNN, a/k/a Big Boy,**

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

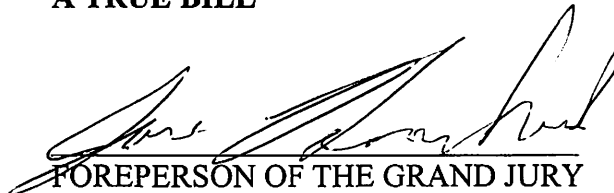
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant -


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL**

  
FOREPERSON OF THE GRAND JURY

  
William F. Abely  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; July 27, 2017.

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK  
12:25